

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:

Danny Goodman, Jr.

Case No. 6:15-bk-01852-CCJ

Chapter 7

Debtor.

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MOTION FOR ENTRY OF AN ORDER EXTENDING TIME
TO FILE REAFFIRMATION AGREEMENT

Debtor, Danny Goodman, Jr. ("Debtor"), by and through his undersigned counsel, hereby moves this Court for entry of an Order extending the deadline by which the Debtor and various creditors are to submit a reaffirmation agreement reaffirming the debt owed by the Debtor to such creditors, and in support states as follows:

1. On May 19, 2015, Debtor filed his Motion for Referral to Mortgage Modification Mediation and Motion for Enlargement of Time to File Reaffirmation Agreement (Doc. 10; the "MMM Motion"). The MMM Motion included a request to extend the time within which to file a reaffirmation agreement between the Debtor and Specialized Loan Servicing ("SLS") should mediation be unsuccessful.

2. On May 20, 2015, the Court entered its Order Directing Mortgage Modification Mediation (Doc. 11; the "MMM Order"). However, the MMM Order did not provide an extension of time for Debtor to file a reaffirmation agreement.

3. On May 29, 2015, Debtor filed his Motion for Entry of Order Extending Time to File Reaffirmation Agreement (Doc. 18).

4. On June 4, 2015, the Court entered its Order Extending Time for Debtor to File Reaffirmation Agreements for forty-two days, or through July 22, 2015. (Doc. 22).

5. On July 13, 2015, Debtor filed his Motion for Entry of an Order Extending Time to File Reaffirmation Agreements with Seterus, Inc. and SLS (Doc. 30).

6. On July 17, 2015, the Court entered its Order Extending Time for Debtor to File Reaffirmation Agreements for sixty (60) days, or through September 18, 2015 (Doc. 31).

7. On September 16, 2015, the Reaffirmation Agreement with Seterus, Inc. was signed by the Debtor and sent to Seterus, Inc. for execution and filing. We anticipate this Reaffirmation Agreement will be filed before the September 18, 2015 deadline.

8. Debtor is continuing to work with creditor, SLS. Counsel for SLS has advised that the reaffirmation agreement is still in process with the SLS reaffirmation department.

9. To date, no discharge has been entered.

10. Accordingly, Debtor requests that the deadline of September 18, 2015 be extended for sixty (60) days, or through November 16, 2015, to allow the Debtor to file his reaffirmation agreement with SLS and to allow time for Seterus, Inc. to file the signed Reaffirmation Agreement.

WHEREFORE, the Debtor respectfully requests that this Court enter an order enlarging the time to file a reaffirmation agreement with SLS and Seterus, Inc., and for such other and further relief the court deems just and proper.

Dated this 16th day of September, 2015.

Respectfully submitted,

/s/ Denise D. Dell-Powell

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ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 16, 2015 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF which will send a Notice of Electronic Filing generated by CM/ECF to those parties registered to receive electronic notices of filing in this case, as follows: Marie Henkel, Chapter 7 Trustee, at mehenkel@yahoo.com, mhenkel@ecf.epiqsystems.com; Office of the U.S. Trustee, at USTP.Region21.OR.ECF@usdoj.gov.

/s/ Denise D. Dell-Powell

Denise D. Dell-Powell